

**STATEMENT OF BASIS (AI No. 17061)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0104884 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** CTCO Shipyard of Louisiana, LLC  
Post Office Box 2617  
Houma, Louisiana 70361

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** January 29, 2010

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of an Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. LPDES permits – LA0104884**  
LPDES permit effective date: December 1, 2004  
LPDES permit expiration date: November 30, 2009

**C. Date Application Received:** December 21, 2009

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - marine towing and barge repair facility**

CTCO Shipyard of Louisiana, LLC is an existing marine towing and barge repair facility. Barges containing petroleum products are emptied of cargo prior to arriving at the facility. Upon arrival for repairs, the barge is stripped of residual cargo (petroleum products). (See Attachment 1 for a list of products.) The majority of the strippings are vacuumed out, placed into drums, and recycled. The remaining product left in the barge is commingled with hot water during the washing operation then pumped into an oil/water separation tank. Gravity separation of this mixture occurs in the tank. The separated washwater then flows into a wash water polishing tank. Another oil separation step occurs, and the final second stage oil is pumped back to the first stage. After some reuse of the washwater for barge washing, the tank content is treated before discharge using an ozonation system. The treatment process occurs in batches with quality assurance checks to verify water quality before discharging.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: III
3. Wastewater Type: II
4. SIC code: 4463, 3731

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C. LOCATION - 141 Bayou Dularge Road, Houma, Terrebonne Parish  
Latitude 29° 33' 47", Longitude 90° 43' 10"

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: treated petroleum barge washwater  
Treatment: oil/water separation and ozonation  
Location: at the point of discharge from the treatment system  
Flow: intermittent (1,500 gallons per batch discharge)  
Discharge Route: local drainage thence to the Houma Navigational Canal

#### Outfall 102

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant (MoDad 1)  
Location: at the point of discharge from the sewage treatment plant servicing the main office  
Flow: 215 gpd  
Discharge Route: pipe thence to the barge slip thence to the Houma Navigational Canal

#### Outfall 103

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant (Clearwater sanitary system)  
Location: at the point of discharge from the sewage treatment plant servicing the training center and Teppco office building located west of the training center  
Flow: 1,400 gpd  
Discharge Route: pipe thence to local drainage thence to the Houma Navigational Canal

#### Outfall 203

Discharge Type: car washwater  
Treatment: none  
Location: at the point of discharge from the car wash area  
Flow: 225 gpd  
Discharge Route: pipe thence to local drainage thence to the Houma Navigational Canal

#### Outfall 005

Discharge Type: stormwater from the tank farm areas  
Treatment: none  
Location: at the point of discharge from the tank farm outlet  
Flow: 830 gpd  
Discharge Route: local drainage thence to the Houma Navigational Canal

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#### 4. RECEIVING WATERS

STREAM – local drainage thence to the Houma Navigational Canal

BASIN AND SEGMENT - Terrebonne Basin, Segment 120509

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply

#### 5. TMDL STATUS

Subsegment 120509, Houma Navigation Canal-From Houma to Bayou Pelton, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

#### 6. CHANGES FROM PREVIOUS PERMIT

- The limits for Outfalls 102 and 103 have been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit, the weekly average limits have been changed to daily max limits, and pH limits have been added to the outfalls.
- Oil and grease and pH limits have been added to Outfall 203.
- Stormwater Outfalls 002, 003, and 004 have been removed as the stormwater from these outfalls will now be covered by the Stormwater Pollution Prevention Plan in the permit.

#### 7. COMPLIANCE HISTORY/COMMENTS

There have been no inspections within the last five years at the facility. The facility will be referred to surveillance for an inspection.

DMR's were reviewed from June 2006 – June 2008. DMR's have not been submitted since June 2008. There were no excursions found on the DMR's that were submitted. The facility will be referred to Enforcement.

#### 8. EXISTING EFFLUENT LIMITS

Outfall 001 – treated petroleum barge washwater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/discharge Est.	Report 1/discharge Est.

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COD	250 mg/L 1/discharge Grab	400 mg/L 1/discharge Grab
Oil & Grease	---	15 mg/L 1/discharge Grab
Total Phenols	---	0.5 mg/L 1/discharge Grab
Total BTEX	---	0.3 mg/L 1/discharge Grab
pH	6.0-9.0 s.u. 1/discharge Grab	

Outfall 002 – process area stormwater  
Outfalls 003 and 004 – non-process area stormwater  
Outfall 005 – stormwater from tank farm areas

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/3 months Est.	Report 1/3 months Est.
TOC	---	50 mg/L 1/3 months Grab
Oil & Grease	---	15 mg/L 1/3 months Grab
pH	6.0-9.0 s.u. 1/3 months Grab	

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Outfalls 102 and 103 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	Report 1/6 months Est.	Report 1/6 months Est.
BOD <sub>5</sub>	---	45 mg/L 1/6 months Grab
TSS	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	400 col./100mL 1/6 months Grab

Outfall 203 – car washwater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/3 months Est.	Report 1/3 months Est.
COD	200 mg/L 1/3 months Grab	300 mg/L 1/3 months Grab
TSS	---	45 mg/L 1/3 months Grab
Soaps & Detergents	Report 1/3 months Inventory Calculation	

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120509 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated January 5, 2010, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as

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aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

**10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

**12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for CTCO Shipyard of Louisiana, LLC

1. **Outfall 001** – treated petroleum barge washwater (estimated flow is 1,500 gallons per batch)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	250	400	Similar discharges (BPJ); *
Oil & Grease	---	15	Similar discharges (BPJ); *
Total Phenols	---	0.5	Similar discharges (BPJ); *
Total BTEX	---	0.3	Similar discharges (BPJ); *
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges (BPJ); *

**Treatment:** oil/water separator and ozonation

**Monitoring Frequency:** Flow, COD, Oil & Grease, Total Phenols, Total BTEX, and pH shall be monitored once per discharge.

**Limits Justification:** Limits are based on similar discharges and the previous permit.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.2 "Wastewater generated from cleaning tank interiors for the purposes of maintenance and repair on the tank is not considered TEC process wastewater. Facilities that clean tank interiors solely for the purposes of repair and maintenance are not regulated under this Part."

2. **Outfalls 102 and 103** – treated sanitary wastewater (estimated flow is Outfall 102 – 215 gpd; Outfall 103 – 1,400 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
BOD <sub>5</sub>	30	45	BPJ; LAG530000 and similar discharges
TSS	30	45	BPJ; LAG530000 and similar discharges
Fecal Coliform colonies/100ml	200	400	BPJ; LAG530000 and similar discharges
pH, s.u.	6.0 (min)	9.0 (max)	BPJ; LAG530000 and similar discharges

**Treatment:** sewage treatment plants

**Monitoring Frequency:** 1/6 months for all parameters at the point of discharge from the sewage treatment plants prior to combining with other waters.

**Limits Justification:** BPJ; per the Class I Sanitary Discharge General Permit (LAG530000), Schedule B, Treated Sanitary Wastewater less than 5000 GPD and similar discharges.

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3. **Outfall 203 – car washwater (estimated flow is 225 gpd)**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	200	300	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

**Treatment:** none

**Monitoring Frequency:** 1/quarter for flow, COD, TSS, oil & grease, and pH at the point of discharge from the car wash area. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities, the previous permit, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

4. **Outfall 005 – stormwater runoff from the tank farm areas (estimated flow is 830 gpd)**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
TOC	---	50	Multi-sector General Permit (BPJ)*
Oil & Grease	---	15	Multi-sector General Permit (BPJ)*
pH, s.u.	6.0 (min)	9.0 (max)	Multi-sector General Permit (BPJ)*

**Treatment:** none

**Monitoring Frequency:** 1/quarter for flow, TOC, oil & grease, and pH at the point of discharge from the tank farm outlet.

**Limits Justification:** Limits and monitoring frequencies are based on Multi-sector General Permit, LAR050000, BPJ, and the previous permit. NOTE: This outfall is being retained in the permit as there is the potential for stormwater contamination from the tank farm area.

This facility is not subject to the Metal Products and Machinery Effluent Guidelines and Standards (40 CFR Part 438) as no guidelines or standards have been promulgated for the Shipbuilding Dry Dock subcategory.

- \* Existing permits for similar outfalls
- BPJ Best Professional Judgement

Storm Water Pollution Prevention Plan (SWP3) Requirement

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 4463



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and 3731 are considered to have storm water discharges associated with industrial activity. In addition to the SWP3, the barge BMPs will be applied because barge BMPs are comparable to the SWP3 requirements.

**For first time permit issuance**, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).